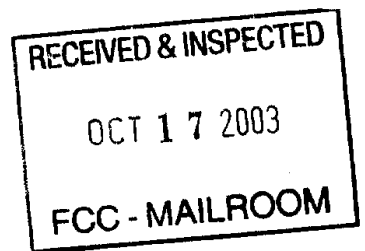


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Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> St. SW  
Room TW-204B  
Washington, D.C. 20554



**Petitioner**

Mark Miller (N5RFX)

5612 Trail Crest Dr.

Arlington TX 76017

**Request for Change**

Revise Part 97 305(c) to include image transmissions as defined in Part 97 3(c)(3) occupying less than 500 Hz in the 80M, 40M (7.000-7.150 MHz), 30M, 20M (14.000-14.150 MHz), 17M (18.068-18.110 MHz), 15M (21.000-21.200 MHz), 12M (24.890-24.930 MHz), and 10M (28.000-28.300) MHz) wavelength bands.

**Reason for Request**

The popularity of personal computers with sound cards and the willingness of programmers to develop and distribute sophisticated communications software has lead to many new operating modes used in the Amateur Radio H.F. bands. One such example combines the digital mode MFSK16 and a narrow band F2C FAX type emission. This combination of two emission types allows an operator to establish communication using text, then automatically switch to the F2C FAX emission, and then automatically switch back to the MFSK16 mode. This mode of operation has become popular with amateur radio operators worldwide since late December 2002, and is currently in use by U.S. amateurs on the bands and sub bands mentioned above. Another mode that has become

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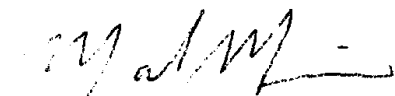
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popular is Hellschreiber. Hellschreiber is best described as a simple form of facsimile using transmitted pulses to directly write images of characters on paper tape or more commonly on a computer screen and is an example of an A1C emission. Hellschreiber has been popular with amateur radio operators worldwide for more than 2 years and is currently in use by U.S. amateurs on the bands and sub bands mentioned above.

### **Rational for Request**

Since image transmissions have occurred and continue to occur on the bands and sub bands listed in the Request for Change paragraph without harmful interference and without complaint to the FCC; it seems natural to bring Part 97 305(c) current with the emissions and operating practices that are currently taking place. The occupied bandwidth limitation of 500Hz is in keeping with the current narrow band nature of emissions in the affected bands.

Respectfully yours,

A handwritten signature in dark ink, appearing to read 'Mark Miller', with a stylized flourish at the end.

Mark Miller